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June 26, 2017

***Via ECFS***

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th St., S.W.  
Washington D.C. 20554

**Re: Special Access for Price Cap Local Exchange Carriers, WC Docket 05-25; Business Data Services in an Internet Protocol Environment, WC Docket No. 16-143 – Recipient Acknowledgments**

Dear Ms. Dortch:

Pursuant to the procedures outlined in the Wireline Competition Bureau's Public Notice,<sup>1</sup> I submit signed Recipient Acknowledgments on behalf of Markham Erickson, Damon Kalt, Tracy Huang, Travis West, and myself, of Steptoe & Johnson LLP, counsel to BT Americas, Inc., Granite Telecommunications, LLC, and INCOMPAS. These individuals have all previously filed Acknowledgments of Confidentiality pursuant to the *Modified Protective Order*,<sup>2</sup> *Second Protective Order*,<sup>3</sup> and the *Data Collection Protective Order*.<sup>4</sup>

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<sup>1</sup> Wireline Competition Bureau Announces Process to Request Unredacted Version of Business Data Services Report and Order, *Public Notice*, DA 17-405 (rel. Apr. 28, 2017).

<sup>2</sup> Special Access for Price Cap Local Exchange Carriers; AT&T Corp. Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services, *Modified Protective Order*, 25 FCC Rcd. 15168 (2010) ("*Modified Protective Order*").

<sup>3</sup> Special Access for Price Cap Local Exchange Carriers, AT&T Corp. Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services, *Second Protective Order*, 25 FCC Rcd. 17725 (2010) ("*Second Protective Order*").

<sup>4</sup> Special Access for Price Cap Local Exchange Carriers; AT&T Corp. Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access

(Continued...)

Marlene H. Dortch  
June 26, 2017  
Page 2



Please contact me if you have any questions regarding this submission.

Respectfully submitted

/s/ Matthew R. Friedman

Matthew R. Friedman

*Counsel to BT Americas, Inc., Granite  
Telecommunications, LLC, and INCOMPAS*

cc: SpecialAccess@fcc.gov

Enclosures

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Services, *Order and Data Collection Protective Order*, 29 FCC Rcd. 11657 (2014) (“*Data Collection Protective Order*”); *see also* Wireline Competition Bureau Now Receiving Acknowledgments of Confidentiality Pursuant to Special Access Data Collection Protective Order, *Public Notice*, 30 FCC Rcd. 6421 (2015).



## RECIPIENT ACKNOWLEDGMENT

**Highly Confidential Version of  
Business Data Services Report and Order  
WC Docket Nos. 16-143, 05-25; GN Docket No. 13-5; RM-10593**

By signing below, you certify that you are Outside Counsel or Outside Consultant (as such terms are defined in the protective orders in WC Docket Nos. 16-143 and 05-25).<sup>1</sup> You agree that you will not make any photocopies of the unredacted Highly Confidential version of the Report and Order in this proceeding adopted on April 20, 2017<sup>2</sup> and that, as required by the protective orders, you will not share any Highly Confidential or Confidential Information (howsoever designated in the Report and Order) except as provided for in the protective orders. You acknowledge the provisions of the protective orders do not terminate at the conclusion of this proceeding. You further acknowledge that any use of the Highly Confidential or Confidential Information contained in the unredacted version of the Report and Order that violates any term or condition found in the protective orders constitutes a violation of an order of the Federal Communications Commission.

I acknowledge that I have read the above paragraph and agree to its terms. I provided Commission staff with a copy of my signed Acknowledgments of Confidentiality. (Acknowledgments) pursuant to the protective orders.<sup>3</sup> I confirm that any challenge to such Acknowledgment has been resolved in my favor and the Acknowledgment remains in full force and effect.

By:

Name: Markham Erickson

Title: Partner

Organization: Stephens & Johnson LLP

Party representing:

BT Americas, Inc.  
Granite Telecommunications LLC  
INCOMPAS

Date:

JUNE 26, 2017

<sup>1</sup> See *Special Access for Price Cap Local Exchange Carriers; AT&T Corp. Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services*, WC Docket Nos. 16-143, 15-247, 05-25, RM-10593, Order, 31 FCC Rcd 7104 (WCB 2016); Order and Modified Data Collection Protective Order, 30 FCC Rcd 10027 (WCB 2015); Order and Data Collection Protective Order, 29 FCC Rcd 11657 (WCB 2014) (*Data Collection Protective Order*); Second Protective Order, 25 FCC Rcd 17725 (WCB 2010) (*Second Protective Order*); Modified Protective Order, 25 FCC Rcd 15168 (WCB 2010) (*Modified Protective Order*).

<sup>2</sup> *Business Data Services in an Internet Protocol Environment, Technology Transitions, Special Access for Price Cap Local Exchange Carriers, AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services*, WC Docket No. 16-143, GN Docket No. 13-5, WC Docket No. 05-25, RM-10593, Report and Order, FCC 17-43 (rel. April 28, 2017).

<sup>3</sup> See *Data Collection Protective Order*, 29 FCC Rcd at 11680, Appx. C; *Second Protective Order*, 25 FCC Rcd at 17733, Appx. A; *Modified Protective Order*, 25 FCC Rcd at 15175, Appx. A.



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By: 

Name: Matt Freedman

Title: Associate

Organization: Stephens & Johnson LLP

Party representing: BT Americas, Inc.  
Granite Telecommunications LLC  
INCOMPAS

Date: 6/26/17

<sup>1</sup> See *Special Access for Price Cap Local Exchange Carriers; AT&T Corp. Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services*, WC Docket Nos. 16-143, 15-247, 05-25, RM-10593, Order, 31 FCC Rcd 7104 (WCB 2016); Order and Modified Data Collection Protective Order, 30 FCC Rcd 10027 (WCB 2015); Order and Data Collection Protective Order, 29 FCC Rcd 11657 (WCB 2014) (*Data Collection Protective Order*); Second Protective Order, 25 FCC Rcd 17725 (WCB 2010) (*Second Protective Order*); Modified Protective Order, 25 FCC Rcd 15168 (WCB 2010) (*Modified Protective Order*).

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By: Ye Huang (Tracy)  
Name: YE HUANG (TRACY)  
Title: ASSOCIATE  
Organization: STEPTOE + JOHNSON LLP  
Party representing: BT Americas Inc  
Granite Telecommunications LLC  
INCOMPAS

Date: 6-26-17

<sup>1</sup> See *Special Access for Price Cap Local Exchange Carriers; AT&T Corp. Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services*, WC Docket Nos. 16-143, 15-247, 05-25, RM-10593, Order, 31 FCC Rcd 7104 (WCB 2016); Order and Modified Data Collection Protective Order, 30 FCC Rcd 10027 (WCB 2015); Order and Data Collection Protective Order, 29 FCC Rcd 11657 (WCB 2014) (*Data Collection Protective Order*); Second Protective Order, 25 FCC Rcd 17725 (WCB 2010) (*Second Protective Order*); Modified Protective Order, 25 FCC Rcd 15168 (WCB 2010) (*Modified Protective Order*).

<sup>2</sup> *Business Data Services in an Internet Protocol Environment, Technology Transitions, Special Access for Price Cap Local Exchange Carriers, AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services*, WC Docket No. 16-143, GN Docket No. 13-5, WC Docket No. 05-25, RM-10593, Report and Order, FCC 17-43 (rel. April 28, 2017).

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By:   
Name: William Travis West  
Title: Associate  
Organization: Steptoe & Johnson LLP  
Party representing: INCOMATS, BT Americas

Date: 6/26/17

<sup>1</sup> See *Special Access for Price Cap Local Exchange Carriers; AT&T Corp. Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services*, WC Docket Nos. 16-143, 15-247, 05-25, RM-10593, Order, 31 FCC Rcd 7104 (WCB 2016); Order and Modified Data Collection Protective Order, 30 FCC Rcd 10027 (WCB 2015); Order and Data Collection Protective Order, 29 FCC Rcd 11657 (WCB 2014) (*Data Collection Protective Order*); Second Protective Order, 25 FCC Rcd 17725 (WCB 2010) (*Second Protective Order*); Modified Protective Order, 25 FCC Rcd 15168 (WCB 2010) (*Modified Protective Order*).

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By: *Damon Kelt*  
Name: *Damon Kelt*  
Title: *Attorney*  
Organization: *Steppe & Johnson*  
Party representing: *BT Americas, Inc. and INCOMPAS*

Date: *6-26-17*

<sup>1</sup> See *Special Access for Price Cap Local Exchange Carriers; AT&T Corp. Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services*, WC Docket Nos. 16-143, 15-247, 05-25, RM-10593, Order, 31 FCC Rcd 7104 (WCB 2016); Order and Modified Data Collection Protective Order, 30 FCC Rcd 10027 (WCB 2015); Order and Data Collection Protective Order, 29 FCC Rcd 11657 (WCB 2014) (*Data Collection Protective Order*); Second Protective Order, 25 FCC Rcd 17725 (WCB 2010) (*Second Protective Order*); Modified Protective Order, 25 FCC Rcd 15168 (WCB 2010) (*Modified Protective Order*).

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